

DTSC Scope Summary

December 5, 2003 Workgroup Meeting December 11, 2003 Stakeholder Workshop Breakout Session

Note: Every attempt was made to capture speakers' key points and comments. Additional stakeholder scope comments or clarification of scope comments below may be made by contacting ewaste@calepa.ca.gov

DTSC Comments:

1. Most cathode ray tubes (CRTs) and CRT devices are electronic hazardous wastes.
2. DTSC scope and timeframe:
 - DTSC will test electronic products to determine if laptop computers, flat panel monitors, and flat panel (i.e., non-CRT) televisions are hazardous wastes.
 - DTSC will determine by March 1, 2004, if laptop computers, flat panel monitors and flat panel (i.e., non-CRT) televisions are hazardous wastes and are within scope of SB 20.
 - Analytical testing of the electronic devices will be done by component testing (e.g., lamps, circuit boards) and the results mathematically adjusted to the weight of the entire device.
 - Analyses will include total concentrations, WET, and TCLP.
3. The timeline for testing other "video display devices" to determine whether they are hazardous and within the scope of SB 20 depends on the types of products, which may be found or interpreted to be included as video display devices.
4. Large research equipment may be considered industrial or commercial equipment if the other conditions of the exemption from "covered electronic device" applies.
5. A request was made for samples of lead free circuit boards and flat panel (non-CRT) televisions for DTSC to analyze.

Stakeholders' Comments:

1. Manufacturers would find the time frame of DTSC determination of laptop computers, flat panel monitors, and flat panel televisions by March 1, 2004, the latest possible date to meet their April 1, 2004 notification requirement to retailers.
2. Manufacturers requested DTSC to make available the standard operating procedures used for sample preparation of electronic wastes.
3. Manufacturers would like to test their products using DTSC standard operating procedures for electronic waste sample preparation and testing.
4. Manufacturers should be able to determine whether or not their products are hazardous using DTSC standard operating procedures for electronic waste preparation and testing.
5. A manufacturer website notification of all products in the scope of SB 20 would be mutually beneficial to manufacturers and retailers. The website would provide retailers one place to retrieve all covered products from all manufacturers.

Discussions involving statutory changes are not noted in this summary.
Some of the interpretative comments made will require legal review.

Manufacturers would be able to provide notification to all of their retailers simultaneously.

6. DTSC should not have to test every electronic device to make a hazardous determination; but should be able to make a determination that any electronic product with a circuit board is a hazardous waste.
7. There is concern if a general determination is made that any electronic product with a circuit board is hazardous since the mass of the circuit board relative to the mass of the product as well as the use of lead-free solder may make a difference between hazardous or non-hazardous.
8. Phasing in other video display devices makes sense, especially with changes in product design, such as lead-free solder used in circuit boards.
9. Categories of other video display devices could include lead-free solder, mercury containing tubes in LCDs, LEDs, etc.
10. A question was raised whether replacement parts (CRT, flat panel screens, or other video display devices) for exempt covered electronic devices (automobiles, large equipment) were subject to SB 20.